

Hawaii

	<u>Present</u>	<u>Proposed</u>
Princeville	255C1, 260C1	255C1
Kalaheo	----	260C1

Conclusion

B&GRS requests the Commission to (a) allot Channel 260C1 to Kalaheo, Hawaii,
and (b) modify the construction permit of KAYI to operate on FM Channel 260C1 at
Kalaheo, Hawaii.

Respectfully submitted,

THE B&GRS PARTNERSHIP

By:



Gary S. Smithwick
Its Attorney

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December 11, 1998

Technical Comments
In Support of the Addition of
Channel 260C1 at
Kalaheo, Hawaii
December, 1998

These Technical Comments are being filed on behalf of The B&GRS Partnership (hereinafter referred to as "B&GRS"), permittee of KAYI, Princeville, Hawaii. B&GRS hereby seek to re-allocate Channel 260 C1 from Princeville to Kalaheo, Hawaii.

B&GRS recently purchased the KAYI Construction Permit at Princeville. It was later determined that the currently authorized site is no longer able to accommodate the KAYI antenna. On a trip to Princeville and the Island of Kauai it was learned of the fierce local opposition to any new tower construction on the island. In fact, the owner of one newly authorized tower is under the threat of suit from island residents who are able to see the newly erected structure from their home. Because of this local opposition to new towers, this requested rule making seeks to change the city of license to a city that can be served from one or more existing tower structures. To the knowledge of the petitioner, no existing tower structure is available that would allow city grade service to Princeville, Hawaii.

ALLOCATION

The allocation reference of North Latitude 21° 59' 54" and West Longitude 159° 25' 35" clears all Class C1 §73.207 allocation constraints (See Exhibit #1). This hypothetical site is the existing tower for KFMN Radio Station.

CITY GRADE COVERAGE

This proposal will serve 100% of Kalaheo, Hawaii with the 3.16 mV/m city grade contour. Exhibit #2 is drawn to illustrate that coverage. This exhibit utilizes the same center of radiation above mean sea level as the existing KFMN to calculate this coverage. It is doubtful that environmental interests would allow a structure tall enough to produce a class maximum height above average terrain.

PRINCEVILLE, HAWAII

Although Channel 260 C1 at Princeville is requesting to be deleted, Princeville still has allocated Channel 255 C1. Exhibit #3 is a \$73.207 spacing study indicating that another Class C1 equivalent channel is available should anyone voice an interest in providing Princeville with FM service. Any new Princeville applicant will encounter the same tower obstacles as the B&GRS. Because service to Princeville has never been instituted, the deletion of 260C1 will cause no loss of service.

STATIONS SERVING PRINCEVILLE

When the B&GRS is granted permission to commence service in Kalaheo rather than Princeville, Princeville will continue to receive service from a variety of AM and FM stations. The 2.0 mV/m contour for AM stations and the 1.0 mV/m contour for FM stations were used in these calculations. Those continued services are:

New	CP	205C1
KKCR	LI	214A
KQNG	LI	228C1
KSRF	CP	240C1
KFMN	LI	245C1
KAWV	CP	251C1

KAWT	CP	255C1 ¹
KAUI	CP	277C1
KQNG-AM	LI	570 kHz
KAUI-AM	LI	720 kHz
KAYI	CP	260C1 (this proposal)

KALAHEO, HAWAII

Just as Princeville, Kalaheo is also a Census Designated Place on the Hawaiian Island of Kauai. It is located in the Eleele-Kalaheo division of Kauai County and has a 1990 population of 3,592 persons.² Kalaheo is not in an urbanized area. Channel 260 C1 would be the first broadcast service allocated to this community.

REQUEST

The following changes of §73.202 are requested:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Princeville	255C1, 260C1	255C1
Kalaheo	None	260C1

All information contained herein is true and accurate to the knowledge of the undersigned.


 Clifford G. Moor
 Bromo Communications, Inc.

December 10, 1998

¹ Although KAWT (CP) has filed a petition to relocate to Kapaa, Hawaii the station remains allocated to Princeville.

² This is far greater than the 1,244 population of Princeville .

BROMO COMMUNICATIONS INC
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Requested Rule Making
 Kalaheo, Hawaii

REFERENCE	CLASS C1	DISPLAY DATES
21 59 54 N		DATA 09-19-98
159 25 35 W	Current rules spacings	SEARCH 09-24-98
----- CHANNEL 260 - 99.9 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KAYI.C	260C1	Princeville	HI	5.4	25.21	245.0	-219.79 *
CP DCN	22 13 30	159 24 13	51.000 kW	-96M	15.7	152.3	
	Moore Broadcasting Company				BPH950117MG		990316
KORL	258C	Honolulu	HI	115.9	152.50	105.0	47.50
LI DEN	21 23 51	158 06 01	100.000 kW	599M	94.8	65.3	
	Loew Broadcasting Corporation				BLH970418KG		
>One-step application							
KCCNFM	262C	Honolulu	HI	115.9	152.50	105.0	47.50
LI DEN	21 23 51	158 06 01	100.000 kW	599M	94.8	65.3	
	Honolulu Broadcasting Corpora				BLH940331KA		

§73.207 Allocation Study

EXHIBIT #1
Technical Comments
 In Support of the Addition of
 Channel 260C1 at
 Kalaheo, Hawaii
 September 1998

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BROADCAST
 TECHNICAL CONSULTANTS

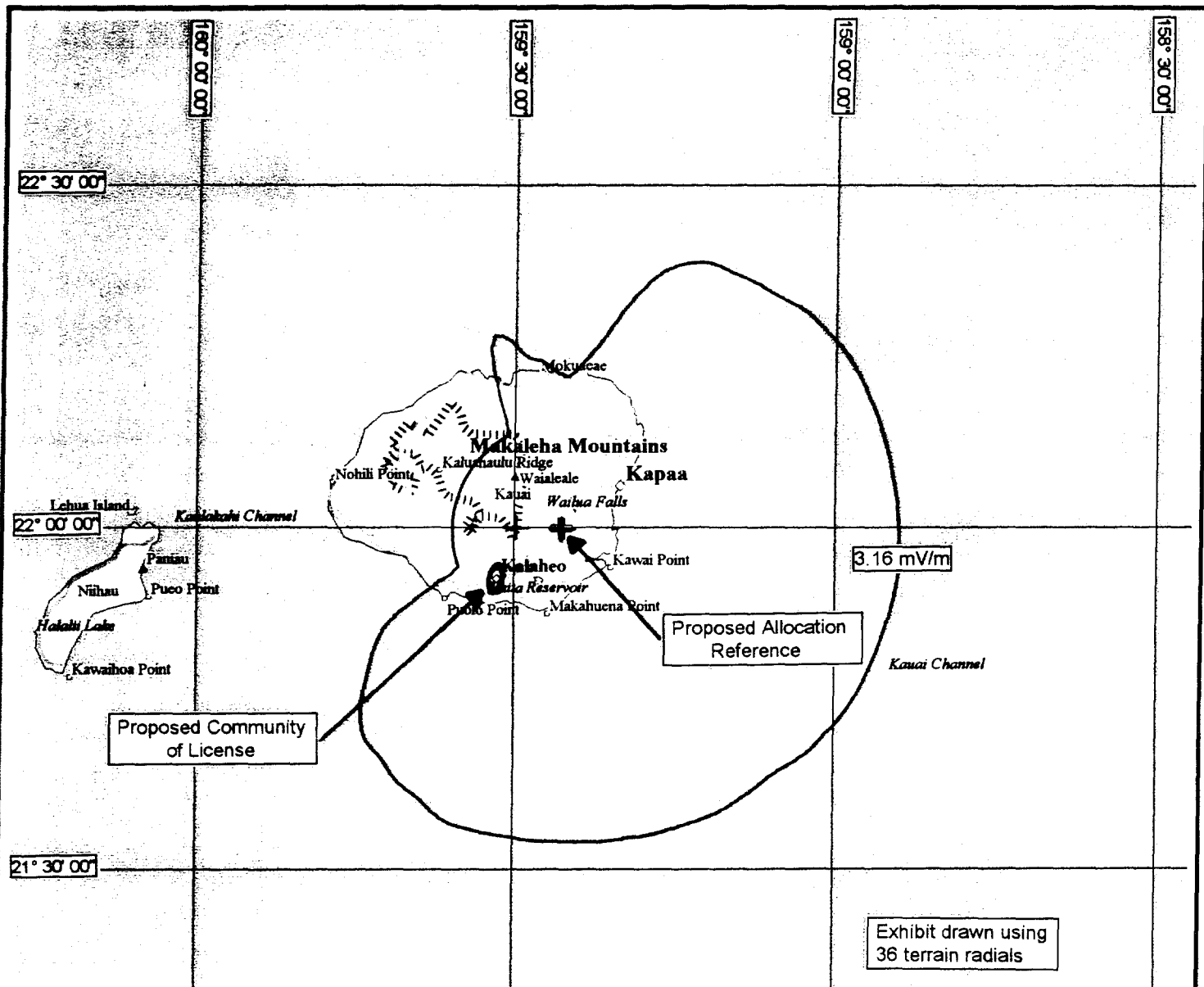
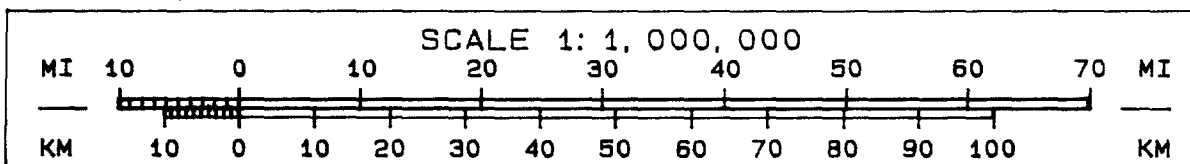


Exhibit drawn using
36 terrain radials



City Grade Coverage

Proposed Allotment Reference:
21° 59' 54" North Latitude
159° 25' 35" West Longitude

Map is State of Hawaii
Islands of Kauai and Niihau
Scale 1:1,000,000
©1993 DeLorme Mapping

EXHIBIT #2
Technical Comments
In Support of the Addition of
Channel 260C1 at
Kalaheo, Hawaii
September 1998

BROMO BROADCAST
COMMUNICATIONS TECHNICAL CONSULTANTS

BROMO COMMUNICATIONS INC
(706) 782-7222 - (202) 429-0600

Alternate Channel
Princeville, Hawaii

REFERENCE
22 13 30 N
159 24 13 W

CLASS C1
Current rules spacings
CHANNEL 297 -107.3 MHz

DISPLAY DATES
DATA 09-19-98
SEARCH 09-24-19

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
KGMZ	300C	Aiea	HI	124.2	162.96	105.0	57.96
LI DEN	21 23 51	158 06 01	100.000 kW	599M	101.3	65.3	
	KTSS-FM, Inc.				BLH920828KG		

Alternate Princeville Channel

EXHIBIT #3
Technical Comments
In Support of the Addition of
Channel 260C1 at
Kalaheo, Hawaii
September 1998

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BROADCAST
TECHNICAL CONSULTANTS